

ANTONIO L. CORTÉS
Attorney at Law
Bar No. 142356
528 Wisteria Way
San Rafael, California 94903
Tel: 415-256-1911
Fax: 415-256-1919

Attorney for Plaintiff
Jose and Virginia Hernandez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE HERNANDEZ, *et al.*,) CASE NO. CV 08-2804 EMC
Plaintiffs,)
v.)
SURINDER SROA, *et al.*,)
Defendants)

)

) **STIPULATED JOINT REQUEST
FOR CONTINUANCE;
[PROPOSED] ORDER**

The undersigned counsel, who represent all parties who have appeared or waived service, jointly request this honorable Court to continue, for 28 days, each of the dates set by the Clerk's June 5, 2008 ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES.

Good cause for the requested continuance exists in that some Defendants are in settlement discussions with Plaintiff, two Defendants have reached an agreement with Plaintiffs to settle, and three Defendants have neither waived service of process nor been served with process, though Plaintiff represents that those three should soon be served.

ANTONIO L. CORTÉS 27
528 WISTERIA WAY
SAN RAFAEL, CA 94903
(415) 256-1911
FAX: (415) 256-1919 28

1 DATED: August 20, 2008

2 _____/s/_____

3 Antonio L. Cortes
4 Counsel for Plaintiffs

5 DATED: August 20, 2008

6 _____/s/_____

7 Albert E. Cordova, Esq.
8 Counsel for Surinder and Linda. Sroa and
9 Agustin and Calista Reyes

10 DATED: August 20, 2008

11 _____/s/_____

12 Brian H. Gunn, Esq.,
13 Counsel for Citibank (West)

14 DATED: August 20, 2008

15 _____/s/_____

16 Edward Egan Smith, Esq.,
17 Counsel for Old Republic Title Company and
18 Terry McGillicuddy

19 [

20 PROPOSED] ORDER

21 The foregoing parties having requested a continuance of the dates set by the
22 Clerk's June 5, 2008 ORDER SETTING INITIAL CASE MANAGEMENT
23 CONFERENCE AND ADR DEADLINES, and good cause appearing therefor, it is hereby
24

1 ORDERED, that the following dates shall supersede those set by the June 5,
 2 2008 ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR
 3 DEADLINES:

Date	Event	Governing Rule
9/17/2008	Last day to: <ul style="list-style-type: none"> • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan • file ADR Certification signed by Parties and Counsel • file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference 	FRCivP 26(f) & ADR L.R. 3-5 Civil L.R. 16-8(b) & ADR L.R. 3-5(b) Civil L.R. 16-8(c) & ADR L.R. 3-5(b) & (c)
10/1/2008	Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re contents of Joint Case Management Statement	FRCivP 26(a)(1) & L.R. 16-9
10/8/2008	INITIAL CASE MANAGEMENT CONFERENCE (CMC) in Courtroom C, 15 th Floor, SF at 1:30 PM	Civil L.R. 16-10

17 SO ORDERED. IT IS FURTHER ORDERED that Plaintiff's counsel serve this Order upon
 18 all other parties in this action.

19 Date: September 3, 2008

